UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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Plaintiff,

vs.

GABRIEL LORENZ,

INDICTMENT

Defendant.

The Grand Jury charges:

COUNT 1

(Conspiracy to Distribute and to Possess with the Intent to Distribute Cocaine)

Beginning on an unknown date and continuing from on or about May 8, 2022 through on or about January 9, 2023, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

GABRIEL LORENZ,

knowingly and intentionally combined, conspired, confederated, and agreed with persons known and unknown to the Grand Jury to distribute and to possess with intent to distribute cocaine, a Schedule II controlled substance.

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

COUNT 2

(Attempted Possession with Intent to Distribute Cocaine)

On or about November 21 and 22, 2022, in Kent and Newaygo Counties, in the Southern Division of the Western District of Michigan, the defendant,

GABRIEL LORENZ,

knowingly and intentionally attempted to possess with intent to distribute cocaine, a Schedule II controlled substance.

21 U.S.C. § 846 21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(C)

COUNT 3

(Possession with Intent to Distribute Cocaine)

On or about January 9, 2023, in Kent County, in the Southern Division of the Western District of Michigan, the defendant,

GABRIEL LORENZ,

knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II controlled substance, which was seized from inside a vehicle.

21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(C)

COUNT 4

(Possession with Intent to Distribute Cocaine)

On or about January 9, 2023, in Kent County, in the Southern Division of the Western District of Michigan, the defendant,

GABRIEL LORENZ,

knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II controlled substance, which was seized from inside an apartment.

21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(C) FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 4 of this Indictment are hereby re-

alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to

21 U.S.C. § 853.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C.

§ 841(a)(1) and/or § 846 set forth in Counts 1 through 4 of this Indictment, the defendant,

GABRIEL LORENZ,

shall forfeit to the United States of America any property constituting, or derived from,

any proceeds obtained, directly or indirectly, as the result of such offense and any

property used, or intended to be used, in any manner or part, to commit, or to facilitate

the commission of, the offense. The property to be forfeited includes, but is not limited

to, the following: approximately \$1,645 in United States Currency seized from the person

of the defendant; approximately \$4,500 in United States Currency seized from an

apartment; and one 2014 Tesla, Model S automobile with vehicle identification number

(VIN) 5YJSA1H10EFP34591.

21 U.S.C. § 853

21 U.S.C. § 841(a)(1)

21 U.S.C. § 846

A TRUE BILL

GRAND JURY FOREPERSON

MARK A. TOTTEN United States Attorney

AUSTIN J. HAKES

Assistant United States Attorney